



# FreshProduce

ASSOCIATION OF THE AMERICAS

July 24, 2006

USDA, AMS, FVP, FPB  
Standardization Section  
Room 1661 - South, STOP 0240  
1400 Independence Avenue, SW  
Washington, D.C. 20250-0240

Fax: (202) 720-8871

Email: [FPB.DocketClerk@usda.gov](mailto:FPB.DocketClerk@usda.gov)

Re: Tomatoes on the Vine Standard (Docket Number FV-06-309)

Dear Sir or Madam:

The Fresh Produce Association of the Americas (FPAA) appreciates the efforts of the U.S. Department of Agriculture (USDA) to incorporate the previous comments of the FPAA regarding the establishment of a separate standard for tomatoes on the vine (TOV). The FPAA is including further comments in this letter with respect to the proposed standard by USDA.

The FPAA is a U.S. trade association representing U.S. companies involved in the growing, packing, importing, and marketing of greenhouse tomatoes grown in Mexico. The FPAA was founded in 1944 and is headquartered in Nogales, Arizona.

#### **Tolerance for individual packages**

The FPAA supports the proposal to recognize higher tolerances within individual boxes. Given that there are only 30 to 45 tomatoes on roughly 6 to 10 bunches in an 11 pound box of loose TOV, a defect to a single vine would otherwise automatically throw lots out of grade, even though the overall quality of the lot is reasonable. The FPAA proposes that defects be scored based on the total count of tomatoes in the box and not based on the number of bunches or containers in the box.

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### **Shatter standard**

The FPAA recognizes that much of the market appeal for consumers of TOV is purchasing tomatoes that are still on the vine, even though from a commercial standpoint virtually all tomatoes from a TOV are still sold to the consumer with minimal shrink, even if they are loose from the vine. This lack of lost sales is a result of current retail demand that directs suppliers to mark all pieces of fruit with a Price Look Up sticker for bulk product or to bag or pack into a single sale container. In addition, the FPAA has seen no data from receivers concerning typical shatter amounts on arrival, meaning the proposed standard is an arbitrary number that reflects little on the salability of the product.

Therefore, the FPAA is concerned about the proposed shatter standard. When the product is held at the correct temperature and humidity, the proposed standard works well. However, shatter significantly increases when the product is outside the ideal temperature and humidity ranges, is handled for inspection, or handled roughly during the offloading of pallets. At a minimum the FPAA encourages USDA to direct inspectors in the inspection handbook to minimize handling of the TOV and to not remove the product from the bag before making the calculation regarding shatter.

Given these factors, the standard will create difficulties to adjudicate responsibility for failed lots as a result of shatter. The FPAA requests that this tolerance be revisited after the standard has been in effect and the results of the inspections are better known.

### **Stems**

Given the inclusion of the shatter tolerance, the FPAA believes that the condition of the stems is important as well. The proposed standard appears to read that moldy stems would be classified under other comments during an inspection, but would not be scored against the U.S. No. 1 grade. In addition, the FPAA supports the brittle stem classification, upon the condition that the USDA use the standards in place for table grapes in establishing their definitions in the inspection handbook.

### **Maturity**

The FPAA supports the maturity requirement that states that the tomatoes should show at least a break in color. The FPAA believes that tomatoes any less mature will likely have a negative impact on the consumption of the product with consumers.

### **Size standard**

The FPAA suggests that the size standard be removed from the grade standard. The nature of TOV encourages a degree of variation of size of individual tomatoes within the cluster as well as the box. While the FPAA appreciates the flexibility proposed by the USDA regarding size, the proposal does not advance current trade standards.

### **Exclusion of cocktail and cherry tomatoes on the vine**

The FPAA believes that overall the proposed grade standard reflects the current varieties and characteristics of regular and roma tomatoes on the vine in today's market. However, the current varieties of cocktail and cherry tomatoes on the vine that are popular with consumers show some different characteristics that would not allow them to be marketed under the current grade standard. In particular, the current varieties tend to have much more brittle stems and higher shatter, which has led to marketing these varieties in



individually wrapped containers instead of bulk at the retail level. The FPAA is concerned that the market would lose the high flavor characteristics common in these varieties if such emphasis was placed on stem condition. The FPAA would, therefore, propose to exempt cherry and cocktail tomatoes on the vine from the standard at this time.

Once again, the FPAA wishes to thank the effort and the work done by the staff of the USDA in developing a proposal to establish a standard for tomatoes on the vine. The members and staff of the FPAA stand ready to assist you in any way helpful to this project.

Sincerely,



Lee Frankel  
President  
Fresh Produce Association of the Americas

